

REDACTED - FOR PUBLIC INSPECTION

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August 27, 2012

VIA HAND DELIVERY

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Washington, DC 20554

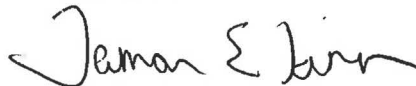
Re: **Special Access Rates for Price Cap Local Exchange Carriers;**
AT&T Corp. Petition for Rulemaking to Reform Regulation of
Incumbent Local Exchange Carrier Rates for Interstate
Special Access Services, WC Docket No. 05-25, RM-10593

Dear Ms. Dortch:

On behalf of TDS Metrocom, LLC ("TDS Metrocom"), enclosed is an ex parte notice for filing in the above-captioned proceeding. The filing contains Highly Confidential Information that has been marked "HIGHLY CONFIDENTIAL - SUBJECT TO SECOND PROTECTIVE ORDER IN WC DOCKET NO. 05-25; RM-10593, BEFORE THE FEDERAL COMMUNICATIONS COMMISSION" in accordance with the Second Protective Order issued in this proceeding.¹

As specified in the *Second Protective Order*, enclosed are one original of the Highly Confidential filing and two (2) copies of the redacted filing.² Also, as required by the *Second Protective Order*, two (2) copies of the Highly Confidential version of the ex parte notice will be delivered to Mr. Andrew Multz of the Wireline Competition Bureau.³

Sincerely yours,



Tamar E. Finn

cc (redacted version by e-mail): Eric Ralph

¹ See *Special Access for Price Cap Local Exchange Carriers*, Second Protective Order, 25 FCC Rcd 17725 (2010) ("*Second Protective Order*").

² *Second Protective Order*, ¶15.

³ *Id.*

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Re: Special Access Rates for Price Cap Local Exchange Carriers;
AT&T Corp. Petition for Rulemaking to Reform Regulation of
Incumbent Local Exchange Carrier Rates for Interstate
Special Access Services, WC Docket No. 05-25, RM-10593

Dear Ms. Dortch:

On August 23, 2012, Steve Pitterle, Manager - Carrier Relations, of TDS Metrocom, LLC ("TDS Metrocom"), along with the undersigned spoke with Eric Ralph, Chief Economist of the Wireline Competition Bureau. TDS Metrocom addressed questions from Mr. Ralph regarding the data that it would be able to provide in response to a mandatory data request in the above referenced proceeding.

The participants discussed how a *de minimis* exception to a mandatory data request could ease the burden on small companies such as TDS Metrocom, who are not significant providers of on-net connections or significant purchasers of special access services. During the conversation, TDS Metrocom noted that if it had to report on connections that include UNEs leased from the ILEC, it would greatly increase the burden of responding to the data request. TDS Metrocom has approximately ***BEGIN CONFIDENTIAL*** on-net connections where it has deployed fiber directly to a customer location, and approximately ***BEGIN CONFIDENTIAL*** UNE T-1 loop connections to customer locations. TDS Metrocom explained that, depending on the level of detail required for each end user connection, it could be required to expend significant resources to review multiple data sources in order to compile and provide the requested information. TDS Metrocom urged the Commission to consider the burden of detailed requests on small companies.

Sincerely yours,



Tamar E. Finn

cc (redacted version by e-mail): Eric Ralph

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